

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Chapter 13
Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Debtors.	Case No. 15-21567-GLT
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION,  Movant,  v.  Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Respondents.	Document No. ____  Related to Document No. 76  Related to Claim No. 16  Objection Deadline: November 26, 2018  Hearing Date and Time: December 5, 2018 at 10:00 a.m.

**[CONSENT] MOTION FOR AN ORDER EXTENDING TIME TO RESPOND  
TO OBJECTION TO MOVANT'S NOTICE OF MORTGAGE PAYMENT CHANGE**

JPMorgan Chase Bank, N.A. (“Chase”), by and through its undersigned counsel, hereby moves (the “Motion”) the Court for the entry of an order extending Chase’s time to respond to the Debtors’ objection to Chase’s notice of mortgage payment change, and in support hereof, states as follows:

1. On October 18, 2018, Chase filed a notice of mortgage payment change (the “PCN”).
2. On November 8, 2018, the Debtors filed the Objection to Movant’s Notice of Mortgage Payment Change (the “Objection”). *See* Doc. No. 76.
3. Chase’s current deadline to respond to the Objection is November 26, 2018, and the Objection currently is set for hearing on December 5, 2018 at 10:00 a.m.

4. Undersigned counsel was retained to act as counsel for Chase in this matter on November 20, 2018, and needs additional time to gather information and prepare a response.

5. Chase requests an extension of time to respond to the Objection, through and including December 28, 2018, to formulate and file an appropriate response to the Objection. Chase further requests a continuance of the hearing to the Court's next available chapter 13 hearing date occurring after December 28, 2018.

6. This Motion is made in good faith and is not made for purposes of delay or other improper purpose.

7. Counsel for the Debtors has reviewed this Motion and has consented to the relief requested herein.

WHEREFORE, Chase respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (i) granting the Motion, (ii) extending Chase's time to respond to the Objection through and including December 28, 2018, (iii) rescheduling the hearing currently scheduled for December 5, 2018 to the Court's next available chapter 13 hearing date after December 28, 2018, and (iv) granting such other and further relief as may be just and proper.

Dated: November 26, 2018

Respectfully submitted,

K&L Gates LLP

By: David R. Fine

David R. Fine

Pa. Supreme Ct. No. 66742

17 North Second Street, 18th Floor

Harrisburg, Pennsylvania 17101-1507

Telephone: (717) 231-5820

Facsimile: (717) 231-4501

Email: david.fine@klgates.com

*Counsel to JPMorgan Chase Bank, National Association*

**EXHIBIT A**

Proposed Order

(Attached)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Chapter 13
Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Debtors.	Case No. 15-21567-GLT
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION,  Movant,  v.  Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Respondents.	Document No. ____  Related to Document No. ____  Related to Claim No. 16  Objection Deadline: November 26, 2018  Hearing Date and Time: December 5, 2018 at 10:00 a.m.

**ORDER EXTENDING TIME TO RESPOND TO OBJECTION  
TO MOVANT'S NOTICE OF MORTGAGE PAYMENT CHANGE**

Upon consideration of the *Consent Motion for an Order Extending Time to Respond to Objection to Movant's Notice of Mortgage Payment Change* (the “Motion”), and after due deliberation and good and sufficient cause appearing,

IT IS HERBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. JPMorgan Chase Bank, National Association’s deadline to respond to the

Debtors’ Objection to Movant’s Notice of Mortgage Payment Change, located at Docket No. 76 (the “Objection”), is extended through and including December 28, 2018.

3. The hearing on the Objection is rescheduled for \_\_\_\_\_, 2019, at \_\_\_\_\_ in Courtroom A, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219.

4. The hearing scheduled for December 5, 2018, is cancelled.

Prepared by: David R. Fine

Dated: \_\_\_\_\_

---

THE HONORABLE GREGORY L. TADDONIO  
UNITED STATES BANKRUPTCY COURT

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Chapter 13
Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Debtors.	Case No. 15-21567-GLT
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION,  Movant,  v.  Bryan E. Zebroski and Melissa S. Zebroski aka Melissa Mustari,  Respondents.	Document No. ____  Related to Document No. ____  Related to Claim No. 16  Objection Deadline: November 26, 2018  Hearing Date and Time: December 5, 2018 at 10:00 a.m.

**CERTIFICATE OF SERVICE FOR CONSENT MOTION FOR  
AN ORDER EXTENDING TIME TO RESPOND TO OBJECTION  
TO MOVANT'S NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above-captioned pleading on the parties and in the manner specified below on November 26, 2018.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

**Service by NEF**

Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov  
Ronda J. Winnecour cmeclf@chapter13trusteewdpa.com  
Alan R. Patterson on behalf of the Debtors apattersonlaw@protonmail.com

By: /s/ David R. Fine